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Trenton, N.J. 08625-0028

**State of New Jersey**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

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19 JUL 1988

Ms. Janet Feldstein  
Site Compliance Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency  
26 Federal Plaza  
New York, New York 10278

Dear Ms. Feldstein:

Re: SCP Carlstadt Site, Bergen County, New Jersey  
ARARS

Please be advised of the following comments pertaining to the SCP Carlstadt ARAR package submitted to this office on July 1, 1988:

1. Section 1.1 - paragraph 4, page 3

The last sentence in this paragraph uses the phrase 'marine life'. This should be changed to 'aquatic life' as the fresh water/salt water interface is not clearly established in Peach Island Creek.

2. Section 2.2, page 8

Emissions of substances such as VO's and TVO's must be evaluated based on loading to assure compliance with air pollution control permit requirements. These requirements include but are not limited to N.J.A.C. 7:27-8.15 which states:

15. Waste or water treatment equipment which emits air contaminants, including, but not limited to, air stripping equipment, aeration basins, and lagoons. An air pollution control permit is not required for:
  - i. Any water treatment equipment if the concentration of each toxic volatile organic substance included in N.J.A.C. 7:27-17 does not exceed 100 parts per billion by weight and the total concentration of VOS does not exceed 3,500 parts per billion by weight; or

- ii. Potable water treatment equipment, except air stripping equipment with a capacity greater than 100,000 gallons per day;

3. Section 2.6, page 12

Please note: Contractors involved with the remediation of hazardous waste sites must be registered with the State of New Jersey.

4. Section 3.0, page 14

The proper name for N.J.S.A. 58:16A-50 et seq. is the Flood Hazard Area Control Act.

5. Section 4.3 - paragraph 5, page 18

Benzene and xylene are considered volatile organics, not petroleum hydrocarbons therefore the clean-up levels associated with these compounds is 1 ppm not 100 ppm. This paragraph must be rewritten. In addition, the PCB soil clean-up level should be expressed as a range of 1 to 5 ppm, not the specific value 1.5 ppm.

6. Table 4.3, page 37

The footnote for lead clean-up objectives is incorrect. The value shown was originated by the New Jersey Department of Health and is based on a 1986 study concerning exposure to lead in soils.

7. Ground Water Clean-up Levels

The SCP site is extremely contaminated with a diverse range of organic and inorganic compounds which have made their way through the entire ground water regime. The following list quantifies clean-up levels for certain compounds at the site. These values may be more stringent than those values provided in the ARAR package developed by EPA's consultant (EBASCO). It may be that these values are lower than the background levels in the area. Once the data from the off-site wells is obtained and the background is established, these ARARs might be adjusted to encompass that information. A more comprehensive list will be sent to you in 3 to 5 weeks.

Ground Water ARARs (all values are in ppb)

Volatile Compounds

Benzene	1.0
Chlorobenzene	4.0
Chloroethane	*
Chloroform	5.0
1,1 - Dichloroethane	*
1,2 - Dichloroethane	2.0
1,1 - Dichlorethylene	2.0
Ethylbenzene	*

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Methylene chloride	2.0
1,1,2,2 - Tetrachloroethane	1.4
Tetrachloroethylene	1.0
Toluene	*
1,2 - Trans-dichloroethylene	10.0
1,1,1 - Trichloroethane	26.0
Trichloroethylene	1.0
Vinyl chloride	2.0
Methyl ethyl keytone	-
m-xylene and	
o+p-xylenes	44.0 (total)

Acid Compounds

2 - Chlorophenol	*
2,4 - Dichlorophenol	*
2,4 - Dimethylphenol	*
2 - Nitrophenol	*
Phenol	*

Base/Neutral Compounds

Acenaphthene	*
Acenaphthylene	*
Anthracene	*
Benzo (a) pyrene	5.0
Benzo (b) fluoranthene	5.0
bis (2 - Chloroethyl) ether	5.0
Butyl benzyl phthalate	*
2 - Chloronaphthalene	*
Chrysene	5.0
1,2 - Dichlorobenzene	*
Diethyl phthalate	*
Dimethyl phthalate	*
Fluoranthene	5.0
Fluorene	*
Indeno (1, 2, 3 - c, d) pyrene	5.0
Isophorone	*
Naphthalene	*
Nitrobenzene	*
Phenanthrene	*
Pyrene	*

Pesticide Compounds

Beta - BHC	-
4,4' - DDT	3.5
Endosulfan I	-
Endrin	-

001901

PCB Aroclors

Aroclor 1242 0.5

Conventional Analysis

Phenolics, Total 300.0  
Cyanide, Total 200.0  
Petroleum Hydrocarbons ND (not detected)

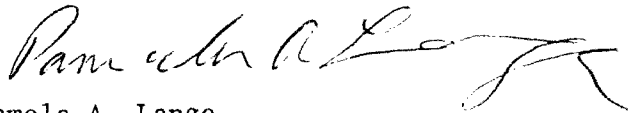
Metals

Arsenic 50.0  
Beryllium -  
Chromium -  
Copper 1000.0  
Mercury 2.0  
Nickel -  
Silver 50.0  
Zinc 5000.0

\* Numbers to be Developed.

If you have any questions or comments please contact me at (609) 633-0701.

Sincerely,



Pamela A. Lange  
Case Manager  
Bureau of Case Management South

PAL/jmh

c: James Schmidtberger, USEPA-Region II  
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